# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN Defendant.

: 209 St. Simons Cove : Peachtree City, GA 30269	
Plaintiffs,	
: : v.	: : : CASE (NOT ASSIGNED)
	NO.
: :	JUDGE
Jason Goodman, : : 252 7th Avenue New York, New York 10001	PLAINTIFF'S COMPLAINT WITH JURY DEMAND

**NOW COMES** George Webb Sweigert ("George Webb Sweigert"),and by and through his own pro se counsel, and states his Complaint for Defamation against Jason Goodman of New York City, New York as follows:

#### CAUSE OF ACTION FOR DEFAMATION

- 1. In July 2021, Jason Goodman filed an Amicus Brief in the Eastern District of Michigan accusing George Webb Sweigert of a Felony, "Fraud On The Court" in the Federal Case 2:20-cv-12933-GAD-KGA.
- 2. Mr. Goodman has repeated this charge on his series of YouTube channels called "Crowdsource The Truth".
- 3. Mr. Goodman had committed defamation per se, libel per se, and slander per se by accusing George Webb Sweigert of committing a Felony.
- 4. Mr. Goodman accuses George Webb Sweigert of coordinating with his brother, David George Sweigert, in a series of lawsuits between Jason Goodman and David George Sweigert which is false.
- 5. In fact, the Plaintiff, George Webb Sweigert, has gone to great lengths to discourage both parties from engaging legally and to amicably resolve their differences. I, George Webb Sweigert, have had very limited communications with my estranged brother. I have had very little contact with my brother, David George Sweigert, and I certainly have not engaged in collusion with him regarding his lawsuit with Jason Goodman.
- 6. Now Mr. Goodman adds to his false accusations about George Webb Sweigert committing a felony of committing Fraud On The Court to add most outrageous, false claims in the Southern District of New York.

### PARTIES, JURISDICTION, AND VENUE

 George Webb Sweigert is a citizen journalist and resides in Fayette County, Georgia. 8. Jason Goodman is a citizen journalist with his principal place of business being located at 252 7th Avenue, Suite #6S, New York, New York, 10001.

### **JURISDICTION**

9. Mr. Jason Goodman has chosen to continue his harassment begun in the Eastern District of Michigan into the Northern District of Georgia where the client moved to avoid threats and harassment. The Jurisdiction for this Defamation case is rightly placed here in the Eastern District of Michigan where the illegal actions by Mr. Goodman's occurred. Defendant Goodman's harassment has followed Plaintiff George Sweigert to Georgia, but since Mr. Goodman's accusation of Fraud on the Court occurred in Michigan, so the Jurisdiction is properly placed there.

### KEY ELEMENTS OF LIBEL PER SE AND SLANDER PER SE

- 10. Jason Goodman published negligently and maliciously falsehoods in an Amicus Brief to this Court, accusing George Webb Sweigert of committing a Felony of Fraud on the Court in the Eastern District of Michigan.
- 11. Jason Goodman published his False and Defamatory

  Accusations negligently and with actual knowledge of falsity and displayed a reckless disregard for the truth.
- 12. Mr. Goodman's vexatious and despicable actions have done irreparable harm to the reputation of George Webb Sweigert, a key test of Defamation.

#### **DAMAGES**

- 13. Mr. Goodman's False and Defamatory Accusations directly and proximately caused substantial and permanent damage to George Webb Sweigert in addition to irreparable harm income, reputations, and future business relationships..
- 14. The False and Defamatory Accusations against George Webb Sweigert by Mr. Jason Goodman are defamatory per se, as they are libelous per se on their face without resort to additional facts or specific quotation, and as clearly demonstrated here, George Webb Sweigert was subjected to public hatred, contempt, scorn, obloquy, and shame.
- 15. As a direct and proximate result of Mr. Jason Goodman's False and Defamatory Accusations, George Webb Sweigert suffered irreparable, permanent harm to his reputation.
- 16. As a direct and proximate result of Mr. Goodman's False and Defamatory Accusations, George Webb Sweigert suffered severe emotional and mental distress.
- 17. Mr. Jason Goodman published its False and Defamatory Accusations with actual malice and common law malice, thereby entitling George Webb Sweigert to an award of punitive damages.
- 18. Mr. Jason Goodman's conduct is outrageous and willful, demonstrating that entire want of care that raises a conscious indifference to consequences.
- 19. George Webb Sweigert is entitled to an award of punitive damages to punish CNN and to deter it from repeating such egregiously unlawful misconduct in the future.

## WHEREFORE, George Webb Sweigert respectfully prays:

- (a) That judgment be entered against Mr. Jason Goodman for substantial compensatory damages in an amount not less than One Million Dollars (\$1,000,000.00); (b) That judgment be entered against Jason Goodman for punitive damages in an amount not less than Five Million Dollars (\$5,000,000.00);
  - (c) That George recover his reasonable attorneys' fees and expenses from Jason Goodman;
  - (d) That all costs of this action be taxed to Jason Goodman; and
  - (e) That the Court grant all such other and further relief that the Court deems just and proper, including equitable relief.

Respectfully submitted this 31th day of December, 2021.

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### **George Webb Sweigert**

George Webb Sweigert (pro se) Georg.webb@gmail.com

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